

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>MICHAEL TECKU; DAVID FINKELSTEIN;</b>	)	
<b>And LAWRENCE TJOK;</b>	)	
<b>Individually and on behalf of</b>	)	
<b>all others similarly situated</b>	)	<b>Case No. 1:20-CV-07327 (VM)</b>
	)	
<i>Plaintiffs,</i>	)	<b>PLAINTIFF’S NOTICE OF</b>
	)	<b>UNOPPOSED MOTION FOR</b>
v.	)	<b>PRELIMINARY APPROVAL OF</b>
	)	<b>SETTLEMENT</b>
<b>YIELDSTREET, INC.; YIELDSTREET</b>	)	
<b>MANAGEMENT, LLC; YS ALTNOTES I, LLC</b>	)	
<b>YS ALTNOTES I, LLC; AND</b>	)	
<b>MICHAEL WEISZ.</b>	)	
	)	
<i>Defendants.</i>	)	

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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the exhibits thereto, and all prior pleadings and proceedings had herein, Plaintiff Lawrence Tjok, in his capacity as class representative for the Certified Class<sup>1</sup>, by and through the undersigned counsel for the Certified Class, moves this Court pursuant to Federal Rule of Civil Procedure 23(e) for an Order:

- (1) preliminarily approving the proposed settlement with all Defendants in this case: YieldStreet, Inc.; YieldStreet Management, LLC; YS Altnotes I, LLC; YS Altnotes II LLC; and Micheal Weisz.
- (2) approving the form and manner of notice of the proposed settlement to the certified class; and

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<sup>1</sup> Per Order of this Court at DE 139, the Certified Class is defined as “All persons who purchased a Borrower Payment Dependent Note (BPDN) issued by YS ALTNOTES I in connection with the following offerings: (1) Vessel Deconstruction I; (2) Vessel Deconstruction Fund III; and (3) Louisiana Oil & Gas Fund, excluding Defendants, any entities in which Defendants have a controlling interest, Defendants’ agents and employees, and any judge to whom this action is assigned and any member of such judge’s staff and immediate family.”

- (3) setting a hearing date for the final approval of the proposed settlement and a schedule for various deadlines relevant thereto.

Submitted in support of this motion:

- (1) Memorandum in Support of Preliminary Approval and the following Exhibits:

Exhibit 1 - Stipulation and Agreement of Settlement and Release;  
Exhibit 2 - Summary Notice;  
Exhibit 3 - Detailed Notice;  
Exhibit 4 - Declaration of Class Counsel;  
Exhibit 5 - Declaration of Defendants' Counsel;  
Exhibit 6 - Declaration of the Claims Administrator; and  
Exhibit 7 - Plan of Allocation

- (2) For the Court's convenience, a Proposed Order is submitted.

Defendants do not oppose the motion.

Respectfully submitted this 25<sup>th</sup> day of October, 2024.

By: /s/ Brian B. Pastor, Esq.

**SONN LAW GROUP, P.A.**

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By: /s/ Dan Centner, Esq.

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*Attorneys for the Plaintiff Lawrence Tjok and the Certified Class*

**CERTIFICATE OF SERVICE**

I certify that on October 25, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/EMF system and which will send notification of such public filing to all counsel registered to receive such notice.

By:/s/ Brian B. Pastor, Esq.  
Brian B. Pastor, Esq.  
**SONN LAW GROUP, P.A.**  
*Attorneys for the Certified Class*